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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

United States of America,

Petitioner,

v.

Sigurd Anderson,

Respondent.

Civil No. 3:14-cv-01932-JST

STIPULATION AND
~~PROPOSED~~ ORDER

IT IS HEREBY STIPULATED by and between Petitioner the United States of America (“United States”) and Respondent Sigurd Anderson (“Respondent”), by and through undersigned counsel, that the parties propose the following procedure in response to the Court’s Order dated August 26, 2014 (Doc. # 28):

1. Respondent shall file an Opposition (consistent with Civil Local Rules 3-4(c)(2), 7-4(b), and 7-11) by September 18, 2014.

2. The United States shall file its Reply (consistent with Civil Local Rules 3-4(c)(2), 7-4(b), and 7-11) by September 25, 2014th.

3. Respondent reserves his right to seek permission to file a Sur-Reply (consistent with Civil Local Rules 3-4(c)(2), 7-3(a), 7-3(d), and 7-4(b)).

4. The United States may re-notice the hearing on the Order to Show Cause for an

available date on the Court's calendar which is not less than 21 days from the date upon which its Reply is filed. Should Respondent file a Sur-Reply, the United States shall re-notice the hearing on the Order to Show Cause for an available date on the Court's calendar which is not less than 21 days from the date upon which the Sur-Reply is filed.

5. Respondent reserves his right to seek a continuance of any hearing date selected by the United States (consistent with Civil Local Rule 7-7(b)), to the extent such date is not acceptable to Respondent.

WHEREFORE the United States and Respondent hereby respectfully request that the Court issue an Order adopting the foregoing schedule, and grant such other and further relief as is just and proper.

Respectfully submitted this 2nd day of September, 2014,

MELINDA HAAG
United States Attorney

s/ Edward O.C. Ord
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s/ Michael G. Pitman
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Assistant United States Attorney, Tax Division

Attorneys for United States of America

Attorney for Respondent Sigurd Anderson

~~[PROPOSED]~~ ORDER

Pursuant to the Stipulation of the parties, and for good cause shown therein, it is hereby ORDERED as follows:

1. Respondent shall file an Opposition (consistent with Civil Local Rules 3-4(c)(2), 7-4(b), and 7-11) by September 18, 2014.

2. The United States shall file its Reply (consistent with Civil Local Rules 3-4(c)(2), 7-4(b), and 7-11) by September 25, 2014th.

3. Respondent may seek permission to file a Sur-Reply (consistent with Civil Local

Rules 3-4(c)(2), 7-3(a), 7-3(d), and 7-4(b)).

4. The United States may re-notice the hearing on the Order to Show Cause for an available date on the Court's calendar which is not less than 21 days from the date upon which its Reply is filed. Should Respondent file a Sur-Reply, the United States shall re-notice the hearing on the Order to Show Cause for an available date on the Court's calendar which is not less than 21 days from the date upon which the Sur-Reply is filed.

5. Respondent may seek a continuance of any hearing date selected by the United States (consistent with Civil Local Rule 7-7(b)), to the extent such date is not acceptable to Respondent.

IT IS SO ORDERED.

Date: September 3, 2014

